

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:
Wilfred Lee Mungro a/k/a Wilfred L. Mungro a/k/a
Wilfred Mungro

CHAPTER 13
CASE NO.: 22-01379 MJC

Debtor
Bank of America, N.A.

Movant

vs.

Wilfred Lee Mungro a/k/a Wilfred L. Mungro a/k/a
Wilfred Mungro

Debtor

Jack N. Zaharopoulos

Trustee

**ANSWER TO MOTION FOR RELIEF
ON BEHALF OF DEBTOR**

AND NOW comes the Debtor, Wilfred Lee Mungro, by and through his attorneys, and answers the Motion for Relief from Automatic Stay by Bank of America, N.A., as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
7. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
8. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
9. Denied. Legal conclusion to which no response is required.
10. Denied. Legal conclusion to which no response is required.

WHEREFORE, Debtor respectfully requests an Order of this Court denying the Motion of Bank of America, N.A., for Relief from the Automatic Stay.

Respectfully Submitted,

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq.
Robert J. Kidwell, Esq.
712 Monroe Street
Stroudsburg, PA 18360
P: 570-421-9090
F: 570-424-9739
rkidwell@newmanwilliams.com
Attorney for Debtor

Date: July 6, 2023